

1 HEATHER E. WILLIAMS, CA Bar #122664
Federal Defender
2 ERIN SNIDER, CA Bar #304781
Assistant Federal Defender
3 Office of the Federal Defender
2300 Tulare Street, Suite 330
4 Fresno, CA 93721-2226
Telephone: (559) 487-5561
5 Fax: (559) 487-5950

6 Attorneys for Defendant
EDGAR RAFAEL NAVARRO CHAVOYA
7

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 EDGAR RAFAEL NAVARRO
CHAVOYA,

15 Defendant.
16

Case No. 1:21-cr-00314-JLT-SKO-1

**STIPULATION TO CONTINUE STATUS
CONFERENCE; ORDER**

Date: October 19, 2022

Time: 1:00 p.m.

Judge: Hon. Sheila K. Oberto

17 IT IS HEREBY STIPULATED by and between the parties through their respective
18 counsel, Assistant United States Attorney Alexandre Dempsey, counsel for plaintiff, and
19 Assistant Federal Defender Erin Snider, counsel for Edgar Rafael Navarro Chavoya, that the
20 Court may continue the status conference currently scheduled for July 20, 2022, at 1:00 p.m. to
21 October 19, 2022, at 1:00 p.m. before the Honorable Sheila K. Oberto.

22 The parties agree and request the Court find the following:

- 23 1. By previous order, this matter was set for a status conference on July 20, 2022.
24 2. The government has produced initial discovery, consisting of 575 Bates-marked
25 pages.
26 3. Defense counsel requires time to review discovery, consult with her client
27 regarding his options, and conduct necessary investigation.
28 4. Defense counsel believes that failure to grant the above-requested continuance

1 would deny her the reasonable time necessary for effective preparation, taking into account the
2 exercise of due diligence.

3 5. The government does not object to the requested continuance.

4 6. Based on the above-stated findings, the ends of justice served by continuing the
5 case as requested outweigh the interest of the public and the defendant in a trial within the
6 original date prescribed by the Speedy Trial Act.

7 7. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
8 *et seq.*, within which trial must commence, the time period of July 20, 2022, to October 19, 2022,
9 inclusive, is excludable pursuant to 18 U.S. C. § 3161(h)(7)(A) and (B)(iv).

10 **IT IS SO STIPULATED.**

11 Respectfully submitted,

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13 PHILLIP A. TALBERT
United States Attorney

14 Date: July 12, 2022

/s/ Alexandre Dempsey
ALEXANDRE DEMPSEY
Assistant United States Attorney
Attorney for Plaintiff

17 HEATHER E. WILLIAMS
18 Federal Defender

19 Date: July 12, 2022

/s/ Erin Snider
ERIN SNIDER
Assistant Federal Defender
Attorney for Defendant
EDGAR RAFAEL NAVARRO CHAVOYA

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ORDER

IT IS SO ORDERED. The status currently scheduled for July 20, 2022, at 1:00 p.m. is hereby continued to October 19, 2022, at 1:00 p.m. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, *et seq.*, within which trial must commence, the time period of July 20, 2022, to October 19, 2022, inclusive, is excluded pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

Date: 7/13/2022

Sheila K. Oberto
Hon. Sheila K. Oberto
United States Magistrate Judge